

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Katrina M. Lewis	:	
	:	Chapter 13
	:	
	:	
Debtor	:	No.: 19-14535AMC

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY PNC BANK NATIONAL ASSOCIATION

COMES NOW, Debtor, Katrina M. Lewis, hereinafter referred to as “Debtor,” by and through her undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by PNC Bank National Association “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. By way of further response, the Debtor requests a post-petition mortgage payment history.
7. Denied.
8. Denied.
9. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362

Respectfully submitted,

Dated: December, 5 2019

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008